

May 25, 2016

By ECF

Honorable Denise Cote
United States District Judge
Southern District of New York
500 Pearl Street, Room 1610
New York, New York 10007

Encarnacion, et al. v. City of New York, 16 CV 00156

Dear Judge Cote:

In accordance with the May 12, 2016 Status Report in the above-referenced matter, I write on behalf of Plaintiffs to provide notice to the Court and to Defendant that Plaintiffs intend to amend their complaint to add additional plaintiffs and assert their claims on a class basis pursuant to Rule 23. We will file this amended complaint by June 3 in accordance with the schedule agreed by the parties.

Respectfully submitted,

/s/ Eric Brenner

Eric Brenner

cc: NEW YORK CITY LAW DEPARTMENT
Aviva Y. Horowitz, Esq.

THE BRONX DEFENDERS
Marianna (Molly) Kovel, Esq.
Johanna B. Steinberg, Esq.
Adam N. Shoop, Esq.